

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**URGENT MOTION FOR LEAVE TO FILE EXCESS PAGES
IN SUPPORT OF (I) OMNIBUS REPLY TO OBJECTIONS TO CONFIRMATION AND
(II) SEVENTH AMENDED TITLE III JOINT PLAN OF
ADJUSTMENT OF THE COMMONWEALTH OF PUERTO RICO, ET AL.**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA”), pursuant to section 315(b) of the *Puerto Rico*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Oversight, Management, and Economic Stability Act (“PROMESA”)² (the Oversight Board, in its capacity as representative of the Commonwealth, ERS, and PBA, is referred to as the “Debtors”), respectfully submits this urgent motion (the “Urgent Motion”), for leave to file (i) the omnibus reply (the “Omnibus Reply”) to the objections interposed to the *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [ECF No. 17627]³ (as it may be amended, modified, or supplemented, the “Plan”) and (ii) *Memorandum of Law in Support of Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (the “Memorandum in Support of Confirmation”) in excess of the page limit set forth in Paragraph I.E. of the *Fifteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 17127-1] (the “Case Management Procedures”).

Jurisdiction and Venue

1. The United States District Court for the District of Puerto Rico (the “Court”) has subject matter jurisdiction over this matter pursuant to PROMESA § 306(a).
2. Venue is proper pursuant to PROMESA § 307(a).

Background

3. On July 30, 2021, the Debtors filed the Plan and a disclosure statement in connection with the Plan [ECF No. 17628] (the “Disclosure Statement”).
4. On August 2, 2021, the Court entered the *Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [ECF No. 17640] (the “Confirmation Scheduling Order”).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

³ All ECF No. references are to Case No. 17-bk-3283-LTS, unless otherwise indicated.

5. On October 8, 2021, the Oversight Board filed the proposed *Order and Judgment Confirming Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [ECF No.18447, Ex. A] (the “Proposed Confirmation Order”).

6. Pursuant to the Confirmation Scheduling Order, the deadline to file an objection to confirmation of the Plan was October 19, 2021, and the deadline to object to the Proposed Order was October 22, 2021. To date, seventy-two (72) objections and/or reservations of rights were interposed to confirmation of the Plan (the “Plan Objections”),⁴ and nine (9) objections and/or reservations of rights were interposed to the Proposed Confirmation Order (the “Confirmation Order Objections,” and collectively with the Plan Objections, the “Objections”). A detailed chart listing the Objections is attached hereto as **Exhibit B**.

Relief Requested

Omnibus Reply

7. Paragraph I.E. of the Case Management Procedures limits memoranda of law in support of each reply to fifteen (15) pages. Case Management Procedures ¶ I.E.

8. The Oversight Board is planning to file a consolidated omnibus reply to the Objections. For the Omnibus Reply to adequately summarize and address the various issues raised by the Objections, the Oversight Board requires more than the 15-page limit for replies set forth in the Case Management Procedures. If the Oversight Board were to file individual replies to all eighty-four (84) Objections, the filings would total more than twelve hundred (1,200) pages. Therefore, filing a single omnibus reply is efficient for all parties, including the Court. Accordingly, the Oversight Board respectfully requests leave to file the Omnibus Reply with a

⁴ In addition, the Debtors have received letters in opposition to confirmation of the Plan, which were not filed with the Court, from: (a) Luiz Roldan Ruiz; (b) Antonia Medina Rodriquez; and (c) Aida Iris Santiago Torres.

length not to exceed one hundred (100) pages, exclusive of the cover page, the table of contents, the table of authorities, the signature page, and exhibits. To the extent necessary, the Oversight Board also respectfully requests leave to include an exhibit of approximately seventy-five (75) pages providing an explanatory chart (the “Confirmation Objection Chart”) summarizing the Objections and the Oversight Board’s replies with respect thereto to assist the Court in its review of the myriad Objections.

Memorandum in Support of Confirmation

9. Paragraph I.E. of the Case Management Procedures limits memorandum in support of motions to thirty-five (35) pages. Case Management Procedures ¶ I.E.

10. These Title III cases were commenced over four (4) years ago, and present complex issues with little precedent. In order to adequately summarize the extensive procedural and factual background and provide the legal bases pursuant to PROMESA section 314(b) necessary for the Court to confirm the Plan, the Oversight Board requires more than the 35-page limit set forth in the Case Management Procedures. Accordingly, the Oversight Board respectfully requests leave to file the Memorandum in Support of Confirmation with a length not to exceed two hundred (200) pages, exclusive of the cover page, the table of contents, the table of authorities, and the signature page.

11. The Oversight Board hereby certifies that there is a true need for urgent relief and that such urgency was not created through any lack of due diligence.

12. No prior request for the relief sought in this Urgent Motion has been made to this or any other court.

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WHEREFORE the Oversight Board respectfully requests the Court to enter the Proposed Order attached hereto as **Exhibit A**, granting the Debtor the relief requested herein and all other relief as is just and proper.

Dated: October 25, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

/s/ Hermann D. Bauer
Hermann D. Bauer

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**ORDER APPROVING
URGENT MOTION FOR LEAVE TO FILE EXCESS PAGES
IN SUPPORT OF (I) OMNIBUS REPLY TO OBJECTIONS TO CONFIRMATION AND
(II) SEVENTH AMENDED TITLE III JOINT PLAN OF
ADJUSTMENT OF THE COMMONWEALTH OF PUERTO RICO, *ET AL.***

Upon the *Urgent Motion for Leave to File Excess Pages in Support of (i) Omnibus Reply to Objections to Confirmation and (ii) Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (the “Urgent Motion”);² and the Court having found it has subject matter jurisdiction over this matter pursuant to section 306(a) of PROMESA; and it

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² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Urgent Motion.

appearing that venue in this district is proper pursuant to section 307(a) of PROMESA; and the Court having found that the Oversight Board provided adequate and appropriate notice of the Urgent Motion under the circumstances and that no other or further notice is required; and upon the record herein, after due deliberation thereon, the Court having found that good and sufficient cause exists for the granting of the relief as set forth herein,

IT IS HEREBY ORDERED THAT:

1. The Urgent Motion is GRANTED as set forth herein.
2. The Oversight Board may file the Omnibus Reply, with a length not to exceed one hundred (100) pages, exclusive of the cover page, the table of contents, the table of authorities, the signature page, and exhibits.
3. The Oversight Board may file the Confirmation Objection Chart with a length not to exceed seventy-five (75) pages.
4. The Oversight Board may file the Memorandum in Support of Confirmation, with a length not to exceed two hundred (200) pages, exclusive of the cover page, the table of contents, the table of authorities, the signature page, and exhibits.
5. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: October ____, 2021

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT COURT JUDGE

Exhibit B

Chart of Objections

<u>ECF Number</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Objector Name</u>
<u>Objections to Confirmation / Reservation of Rights</u>			
9223	11/18/2019	<i>Objection to "Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al." by Creditor PFZ Properties, Inc.</i>	Creditor PFZ Properties, Inc.
12701	4/8/2020	<i>Objection to "Title III Joint Amended Plan of Adjustment of the Commonwealth of Puerto Rico, et. al." by Sucesión Pastor Mandry Mercado, Excepting Javier Mandry Mercado</i>	Sucesión Pastor Mandry Mercado, excepting Javier Mandry Mercado
16481	4/20/2021	<i>Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to "Second Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al."</i>	Sucesión Pastor Mandry Mercado, excepting Javier Mandry Mercado
16668	5/3/2021	<i>Motion to Join Objection to "Second Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al." (Docket No. 16481)</i>	Vicente Pérez Acevedo and Corporación Marcaribe Investment
16871	6/2/2021	<i>Third Amendment Title III Joint Plan Adjustment {ECF No 16740} as Amended. "The Plan" Payment of the Retirement Plan for Public Employees.</i>	Antonio Martin Cervera
16872	6/2/2021	<i>Third Amendment Title III Joint Plan Adjustment {ECF No 16740} as Amended. "The Plan" Payment of the Retirement Plan for Public Employees.</i>	Maria Teresita Martin
16939	6/10/2021	Objection of Wanda I Ortiz Santiago	Wanda I. Ortiz Santiago
16955	6/11/2021	<i>Objections from Retires [sic] Members</i>	Nancy I. Negron-Lopez
16969	6/14/2021	<i>Objection to "Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al." by Creditor PFZ Properties, Inc.</i>	PFZ Properties, Inc.

17001	6/15/2021	<i>Limited Objection of the Ad Hoc Group of FGIC Noteholders to the (I) Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al., and (II) Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Ad Hoc Group of FGIC Noteholders
17005	6/15/2021	<i>Joinder of Creditor Demetrio Amador Inc./Demetrio Amador Roberts to Creditor PFZ Properties, Inc. 's Objection to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al.</i>	Creditor Demetrio Amador Inc. / Demetrio Amador Roberts, ("Amador")
17013	6/15/2021	<i>Objection to Disclosure Statement and or the Plan of Adjustment at Dkt. No. 16740 & 16741</i>	Suiza Dairy Corp. ("Suiza")
17016	6/15/2021	<i>Maruz Real Estate Corp. 's Motion for Joinder to Creditor PFZ Properties, Inc. 's Objection to the Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al. Filed at Docket No. 16969</i>	Maruz Real Estate Corp., ("Maruz")
17021	6/15/2021	<i>Objection to the Third Oversight Board's Plan of Adjustment and Disclosure Statement Dated May 11, 2021 and Requesting for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 3013 to Reclassify Together Employees Wage Claims Included in Class 55, with Class 49 AFSCME Employees Claims or in the Alternative, be Placed in a Separate Class, to Provide Group Wage Claim Holders Equal Treatment as that Provided to AFSCME Employees Grivance [sic] and Colective Barganing [sic] Prepetition Wage Awards and Requesting Related Reliefs</i>	Group Wage Creditors
17047	6/15/2021	<i>Motion to Oposition [sic] to the Restructuration [sic] Plan of the \$100 Billion Fiscal Debt Dismembering What is Left of Puerto Rico. We the People of Vieques Would Like to Know How Much Vieques Owe?</i>	Yashei Rosario - President and Chairman

17062	6/17/2021	<i>Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to "Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al."</i>	Sucesión Pastor Mandry Mercado
17116	6/17/2021	<i>Motion to File Exhibit #1: Copy of the 535 Documents to be File [sic] at the U.S. Congress the White House and the Department of Justice also Submitting, Development Socioeconomic and Conservation Fideicomiso of Vieques Desco, Inc., Board Resolution With the Community Signatures</i>	Yashei Rosario - President and Chairman
17175	6/25/2021	Objection of Wanda I. Ortiz Santiago	Wanda I. Ortiz Santiago
17202	6/30/2021	<i>Reservation of Rights of the Puerto Rico Fiscal Agency and Financial Advisory Authority Regarding the Fourth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF")
17436	7/19/2021	<i>Pro Se Objection Based on a Matter of Fact Issue From 111 Plan of Adjustment of the Commonwealth of Puerto Rico by PROMESA Act</i>	Ana A. Nunez Velazquez
17438	7/20/2021	<i>Pro Se Objection Based on a Matter of Fact Issue from Non Debtors Class on Board</i>	Ana A. Nunez Velazquez
17526	7/27/2021	<i>Motion Reaffirming [sic] Objection to Sixth Amended Disclosure Statement and/or the Sixth Amended Plan of Adjustment at Dkt. No. 17517</i>	Suiza Dairy Corp. ("Suiza")
17998	8/31/2021	<i>Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to "Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al."</i>	Sucesión Pastor Mandry Mercado, Excepting Javier Mandry Mercado
18091	9/13/2021	<i>Informative Motion</i>	Vaquería Tres Monjitas, Inc. (VTM)
18111	9/13/2021	<i>Objections to Confirmation and Discovery in Connection Therewith</i>	Edgardo Marquez Lizardi
18249	9/24/2021	<i>Objections to Confirmation and Discovery in Connection Therewith</i>	Edgardo Marquez Lizardi
18396	10/5/2021	Objection of Maria M. Ortiz Morales	Maria M. Ortiz Morales

18418	10/7/2021	<i>Objection to "Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al." by Creditor PFZ Properties, Inc.</i>	PFZ Properties, Inc.
18433	10/7/2021	<i>Objection to Confirmation of Plan of Reorganization of the GO Bonds (by Individual Bondholder Arthur Samodovitz)</i>	Arthur Samodovitz (Individual Bondholder)
18453	10/11/2021	<i>Reservation of Rights of PSA Creditors Regarding Ballots Cast With Respect to Seventh Amended Plan of Adjustment</i>	PSA Creditors
18479	10/13/2021	<i>Joinder to PSA Creditors' Reservation of Rights Regarding Ballots Cast With Respect to Seventh Amended Plan of Adjustment</i>	Ambac Assurance Corporation ("Ambac")
18485	10/12/2021	<i>Motion in Objection to the Plan of Adjustment Filed Before the Federal Bankruptcy [sic] Court for the District of P.R., ERS</i>	Miguel Luna de Jesus
18486	10/13/2021	<i>Notice of Constitutional Challenge to a Statute</i>	PFZ Properties, Inc.
18504	10/14/2021	<i>Objection to the "Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, Puerto Rico Electric Power Authority, et al."</i>	Ismael L. Purcell Soler, Alys Collazo Bougeois and the community property they compose
18505	10/14/2021	Objection of Mildred Batista De Leon	Mildred Batista De Leon
18506	10/14/2021	Objection of Javier Alejandrino Osorio	Javier Alejandrino Osorio
18511	10/15/2021	<i>Objection of Service Employees International Union to Plan of Adjustment and Proposed Confirmation Order</i>	Service Employees International Union ("SEIU")
18512	10/15/2021	<i>Objection to Seventh Amended Title III Joint Plan of Adjustment of the Puerto Rico Public Buildings Authority</i>	Mapfre PRAICO Insurance Company (the "Surety")
18513	10/15/2021	<i>Objection to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico</i>	Mapfre PRAICO Insurance Company (the "Surety")

18529	10/15/2021	<i>Preserving Rights in Both Ways: Creditors & Debtors at the Oversight Board of Plan of Adjutment [sic] at the Commonwealth of Puerto Rico</i>	Ana A. Nunez Velazquez
18535	10/18/2021	<i>Objection to Confirmation of “The Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al.” by Creditors Who are Plaintiffs in Certain Cases Under 42 U.S.C. §1983</i>	Creditors Who are Plaintiffs in Certain Cases Under 42 U.S.C. §1983
18538	18538	<i>Objection of Med Centro, Inc. Formerly Consejo Salud De La Comunidad De La Playa De Ponce, Inc. to “Seventh Amended Title III Joint Pan [sic] of Adjustment of the Commonwealth of Puerto Rico, et. al”</i>	Med Centro, Inc. Formerly Consejo Salud De La Comunidad De La Playa De Ponce, Inc. (“Med Centro”)
18548	10/18/2021	<i>Motion by the “Asociación De Jubilados De La Judicatura De Puerto Rio” (“AJJPR”) and the Hon. Hector Urgell to Submit Objections to Modification to the Judicial Retirement [sic] System</i>	Asociación De Jubilados De La Judicatura De Puerto Rio (“AJJPR”) and the Hon. Hector Urgell Cuebas
18549	10/18/2021	<i>Legal Brief of the “Asociación De Jubilados De La Judicatura De Puerto Rico” (“AJJPR”) and Hon. Hector Urgell Cuebas, Former Judge of the Puerto Rico Court of Appeals and Participant of the Judicial Retirement System in Support of Motion to Submit Objections to the Modification to the Judicial Retirement System Proposed by FOMB’s Plan of Adjustment and Disclosure Statement</i>	Asociación De Jubilados De La Judicatura De Puerto Rio (“AJJPR”) and the Hon. Hector Urgell Cuebas
18551	10/18/2021	<i>Objection to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico</i>	Cooperativa de Ahorro y Crédito Vegabajeña ("Cooperativa")
18558	10/19/2021	<i>Objection of International Union, UAW to Plan of Adjustment and Proposed Confirmation Order</i>	International Union, UAW

18563	10/19/2021	<i>Maruz Real Estate Corp.'s Motion for Joinder to Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to "Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al. Filed at Docket Number 17998</i>	Maruz Real Estate Corp. ("Maruz")
18564	10/19/2021	<i>Lortu-Ta Ltd, Inc.; La Cuarterola, Inc.; Juaza, Inc.; and the Conjugal Partnership Composed of Juan Zalduondo Viera and Magdalena Machicote Ramery's Motion for Joinder to Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to "Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al. Filed at Docket Number 17998</i>	Lortu-Ta Ltd, Inc.; La Cuarterola, Inc.; Juaza, Inc.; and the Conjugal Partnership Composed of Juan Zalduondo Viera and Magdalena Machicote Ramery, ("Lortu-Ta")
18565	10/19/2021	<i>Sucn. De Frank To Torres Ortiz & Aurea Rodriguez Composed by Frank E. to Torres Rodriguez & Eva to Torres Rodriguez's Motion for Joinder to Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to "Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al. Filed at Docket Number 17998</i>	Sucn. De Frank Torres Ortiz & Aurea Rodriguez Composed by Frank E. Torres Rodriguez & Eva Torres Rodriguez, ("Torres")
18566	10/19/2021	<i>Objection to Confirmation [sic] of Seventh Joint Plan of Adjustment</i>	Finca Matilde, Inc.
18567	10/19/2021	<i>Internal Revenue Service's Limited Objection to Confirmation and Reservation of Rights</i>	Internal Revenue Service
18569	10/19/2021	<i>Statement and Reservation of Rights Regarding the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. and Notice of Submission of Plan Supplement</i>	ERS Bondholders
18570	10/19/2021	<i>Notice of Constitutional Challenge to a Statute</i>	Finca Matilde, Inc.
18573	10/19/2021	<i>Objection to Plan Confirmation</i>	University of Puerto Rico Retirement System Trust (the "Trust")

18575	10/19/2021	<i>Objection to Confirmation of Plan by Individual GO and PBA Bondholder (Peter C. Hein)</i>	Individual GO and PBA Bondholder (Peter C. Hein)
18582	10/19/2021	<i>Joinder of Creditor Demetrio Amador Inc./Demetrio Amador Roberts to Sucesión Pastor Mandry Mercado's, Excepting Javier Mandry Mercado, Objection to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al. Filed at Docket Number 17998</i>	Creditor Demetrio Amador Inc. / Demetrio Amador Roberts, ("AMADOR")
18583	10/19/2021	<i>Limited Objection to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Miriam E. Lima Colón, Betzaida Feliciano Concepción and Angel L. Méndez González (collectively "Creditors")
18585	10/19/2021	<i>Objection of Asociación De Maestros De Puerto Rico and Asociación De Maestros De Puerto Rico-Local Sindical to Confirmation of the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al.</i>	Asociación de Maestros Puerto Rico and the Asociación de Maestros de Puerto Rico-Local Sindical (collectively, "AMPR")
18587	10/19/2021	<i>Joint Objection of the Underwriter Defendants to the Plan and Proposed Confirmation Order</i>	Underwriter Defendants
18588	10/19/2021	<i>Reservation of Rights of the Bank of New York Mellon Regarding Confirmation of Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	The Bank of New York Mellon ("BNYM")
18589	10/19/2021	<i>Statement and Reservation of Rights of Official Committee of Unsecured Creditors Regarding Confirmation of Seventh Amended Title III Joint Plan of Adjustment of Commonwealth of Puerto Rico, et al.</i>	The Official Committee of Unsecured Creditors (the "Committee")
18590	10/19/2021	<i>Objection of the DRA Parties to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. [Dkt. No. 17627]</i>	DRA Parties

18592	10/19/2021	<i>AAFAF's Reservation of Rights Regarding the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. Filed by the Oversight Board</i>	AAFAF
18593	10/19/2021	<i>Objection to Confirmation of the Seventh Plan of Adjustment at Dkt. No. 17,627</i>	Suiza Dairy Corp. ("Suiza")
18594	10/19/2021	<i>Credit Union's Joint Objection to Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al.</i>	Certain Credit Union's
18604	10/19/2021	<i>Limited Objection to Confirmation [sic] of the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Community Health Foundation of P.R. Inc. (hereinafter "CHF")
18560	10/19/2021	<i>Quest Diagnostics of Puerto Rico, Inc.'s Omnibus Objection to (I) Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. and (II) Notice of Filing of Proposed Order Confirming Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Quest Diagnostics of Puerto Rico, Inc.
18631	10/21/2021	<i>Objection of U.S. Bank, as Trustee for the Puerto Rico Finance Corporation Bonds, to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	U.Ss. Bank, as Trustee for the Puerto Rico Finance Corporation Bonds
18632, as amended 18634	10/21/2021	<i>Limited Objection of U.S. Bank as Trustee for PRIFA Bonds and Fiscal Agent for PBA Bonds to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	U.S. Bank as Trustee for PRIFA Bonds and Fiscal Agent for PBA Bonds
18636	10/21/2021	<i>Sealed Motion Objection of the DRA Parties To the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al. [Dkt. No. 17627]</i>	DRA Parties
18637	10/21/2021	<i>Reservation of Rights of Vaqueria Tres Monjitas, Inc. with Respect to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.,</i>	Vaquería Tres Monjitas, Inc. ("VTM")
18663	10/22/2021	Objection of Nilsa Candelario	Nilsa Candelario
Not Filed		Objection of Luis Roldan Ruiz	Luis Roldan Ruiz

Not Filed		Objection of Antonia Medina Rodriguez	Antonia Medina Rodriguez
Not Filed		Objection of Aida Iris Santiago Torres	Aida Iris Santiago Torres

[Continued on following page]

<u>ECF Number</u>	<u>Date Filed</u>	<u>Objection</u>	<u>Objector Name</u>
<u>Objections to Confirmation Order / Reservation of Rights</u>			
18645	10/22/2021	<i>Reservation of Rights of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. with Respect to Initial Proposed Confirmation Order (ECF No. 18447)</i>	Assured
18647	10/22/2021	<i>Objection to Proposed Order and Judgment Confirming Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, Filed by Individual GO Bondholder (Peter C. Hein)</i>	Peter Hein
18651	10/22/2021	<i>Objection to Proposed Confirmation Order at Dkt. No. 18447</i>	Suiza Dairy Corp.
18658	10/22/2021	<i>Statement and Reservation of Rights of Official Committee of Unsecured Creditors Regarding Proposed Order and Judgment Confirming Seventh Amended Title III Joint Plan of Adjustment of Commonwealth of Puerto Rico, et al.</i>	Official Committee of Unsecured Creditors
18662	10/22/2021	<i>Reservation of Rights of the Bank of New York Mellon Regarding the Proposed Order Confirming the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	Bank of New York Mellon
18670	10/22/2021	<i>Qualified Objection to Proposed Confirmation Order</i>	Finca Matilde Inc.
18679	10/22/2021	<i>Reservation of Rights of the Official Committee of Retired Employees with Respect to Initial Proposed Confirmation Order</i>	Retiree Committee
18685	10/22/2021	<i>Objection of the DRA Parties to the Proposed Order and Judgment Confirming Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i>	DRA Parties
18694	10/23/2021	<i>Reservation of Rights of Ambac Assurance Corporation with Respect to Initial Proposed Confirmation Order (ECF No. 18447)</i>	Ambac